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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13 UNITED STATES OF AMERICA,	)	CASE NO. 18-CR-001 BLF
	)	
14 Plaintiff,	)	JOINT STIPULATION AND ORDER FOR
	)	EXCLUSION OF TIME FROM SEPTEMBER 24,
15 v.	)	2019 UNTIL NOVEMBER 5, 2019 FROM THE
	)	SPEEDY TRIAL ACT CALCULATION [18 U.S.C.
16 OSCAR CAMACHO, JR.,	)	§ 3161(H)(7)(A) AND (H)(7)(B)(IV)]
	)	
17 Defendant.	)	

18 JOINT STIPULATION

19 On September 24, 2019, the parties appeared before the Honorable Beth L. Freeman for a status  
20 conference. Defense counsel requested a continuance and exclusion of time to coordinate with  
21 Camacho Jr.'s new defense counsel in another criminal case charged in the Central District of California  
22 and to further consider potential global resolutions of both cases, including a transfer or dismissal of this  
23 case upon sentencing in the Central District. Accordingly, the parties agreed to continue the present  
24 case for a status conference on November 5, 2019, at 9:00 a.m.

25 The parties hereby stipulate that the time between September 24, 2019 and November 5, 2019, at  
26 9:00 a.m., should be excluded from the period of time within which the defendant's trial must  
27 commence pursuant to the Speedy Trial Act in order to allow each counsel sufficient time to effectively

1 prepare, taking into account the exercise of due diligence. Furthermore, the parties stipulate that the  
2 ends of justice served by granting the request outweigh the best interest of the public and the defendant  
3 in a speedy trial.

4 Respectfully submitted,

5 DAVID L. ANDERSON  
6 United States Attorney

7 DATED: September 25, 2019

8 /s/  
9 MARISSA HARRIS  
Assistant United States Attorney

10 DATED: September 25, 2019

11 /s/  
12 MICHAEL HINCKLEY  
Counsel for Oscar Camacho, Jr.

13 ORDER

14 Based upon the stipulation of the parties, and for good cause shown, the COURT HEREBY  
15 ORDERS that the time between September 24, 2019 and November 5, 2019, at 9:00 a.m., is excluded  
16 under the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(7)(A) and 3161(h)(7)(B)(iv).  
17 The Court finds that the failure to grant this request would unreasonably deny each counsel sufficient  
18 time to effectively prepare, taking into account the exercise of due diligence. Furthermore, the Court  
19 finds that the ends of justice served by granting the request outweigh the best interest of the public and  
20 the defendant in a speedy trial and in the prompt disposition of criminal cases.

21 The Court therefore concludes that this exclusion of time should be made under Title 18, United  
22 States Code, Sections 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

23  
24 DATED: September 27, 2019

25 Beth L. Freeman  
26 HON. BETH L. FREEMAN  
27 UNITED STATES DISTRICT JUDGE